

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF SOUTH CAROLINA  
3 CHARLESTON DIVISION

4 DEPOSITION OF CHAD WESTENDORF

5 NAUTILUS INSURANCE COMPANY,

6 Plaintiff,

7 vs. CASE NO. 2:22-cv-1307-RMG

8 RICHARD ALEXANDER MURDAUGH, SR., CORY FLEMING,  
9 MOSS & KUHN, P.A., CHAD WESTENDORF, and  
PALMETTO STATE BANK,

10 Defendants.  
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12 DEPONENT: CHAD WESTENDORF

13 DATE: JUNE 30, 2023  
14

15 TIME: 1:57 P.M.

16 LOCATION: WALKER GRESSETTE FREEMAN & LINTON  
17 CHARLESTON, SC

18 REPORTED BY: RUTH L. MOTT, RPR, CRR  
19 CLARK BOLEN  
20 P.O. BOX 73129  
CHARLESTON, SC 29422  
843-762-6294  
21 WWW.CLARKBOLEN.COM  
22  
23  
24  
25

1 A P P E A R A N C E S

2

ON BEHALF OF PLAINTIFF:

3

EPTING & RANNIK

4

BY: JAAN G. RANNIK

BY: CLINTON MAGILL

5

46A State Street

Charleston, SC 29401

6

jgr@epting-law.com

ctm@epting-law.com

7

ON BEHALF OF CORY FLEMING (BY ZOOM):

8

PENDARVIS LAW OFFICES

9

BY: THOMAS A. PENDARVIS

710 Boundary Street

10

Suite A-1

Beaufort, SC 29902

11

thomas@pendarvislaw.com

12

ON BEHALF OF MOSS & KUHN, PA (BY ZOOM):

13

HOOD LAW FIRM, LLC

BY: ROBERT H. HOOD, JR.

14

172 Meeting Street

Charleston, SC 29401

15

bobbyjr.hood@hoodlaw.com

16

ON BEHALF OF CHAD WESTENDORF:

17

WILLS MASSALON & ALLEN

BY: CHRISTY FORD ALLEN

18

97 Broad Street

Charleston, SC 29401

19

callen@wmalawfirm.net

20

ON BEHALF OF PALMETTO STATE BANK:

21

WALKER GRESSETTE FREEMAN & LINTON

BY: THOMAS P. GRESSETTE, JR.

22

BY: JAMES W. CLEMENT

66 Hasell Street

23

Charleston, SC 29401

gressette@wglfirm.com

24

clement@wglfirm.com

25

ALSO PRESENT: JONATHAN RALEY

1 I N D E X

2

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19 SETTLEMENT OF SATTERFIELD  
20 CASE

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1 CHAD WESTENDORF,

2 being first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. RANNIK:

5 Q. Good afternoon, Mr. Westendorf. We've  
6 chatted a little bit today, but my name's Jaan  
7 Rannik. I represent Nautilus Insurance Company  
8 in this case.

9 I understand you've been deposed before,  
10 correct?

11 A. That is correct.

12 Q. Just the one time?

13 A. Yes, sir.

14 Q. Okay. Let me just quickly go over the  
15 rules of the deposition. I know you heard them  
16 this morning.

17 But if you need a break at any time, let  
18 me know, and we'll take one. I don't think this  
19 is going to be very long. If you don't  
20 understand a question that I ask, please let me  
21 know that, and I will rephrase it. If you have  
22 any doubts about what I'm asking, direct that  
23 question to me. Because if you answer a  
24 question, I'm going to assume you've understood  
25 it; is that fair?

1 A. Yes, sir.

2 Q. You may hear your attorney object to a  
3 question. You still have to answer the question  
4 unless you're instructed not to. Please --  
5 you're already doing a great job of this, giving  
6 verbal answers, yeses and nos, as opposed to head  
7 nods and head shakes. The court reporter will  
8 thank you. And let's make sure that we speak one  
9 at a time, also, to hopefully make her life a  
10 little bit easier.

11 Now, Mr. Westendorf, I want to just very  
12 briefly ask you about the previous deposition  
13 that you've given relating to your service as  
14 personal representative for the Estate of Gloria  
15 Satterfield.

16 That testimony was under oath, right?

17 A. Yes, sir.

18 Q. And you told the truth?

19 A. Yes, sir.

20 Q. And you had the opportunity to review  
21 the transcript after you testified?

22 A. Yes, sir.

23 Q. And correct any errors?

24 A. Yes, sir.

25 Q. Did you correct any errors? Were there

1 any?

2 A. I made one correction in there.

3 Q. Okay. What I'd like to do -- and I  
4 think we can probably save an awful lot of  
5 time -- is mark as Exhibit 1 a copy of that  
6 transcript and the exhibits to it.

7 (Exhibit No. 01 marked for  
8 identification.)

9 Q. I'm just going to ask you -- well, let  
10 me represent to you that this is your testimony  
11 in that prior deposition. Will you just have a  
12 quick look at it and tell me if you agree.

13 A. I mean, it matches up with the number of  
14 pages and everything. I mean, it looks like it's  
15 it. Without reading it, I mean --

16 Q. Of course.

17 MS. ALLEN: Mr. Westendorf just  
18 mentioned that he made one correction. Is that  
19 document in this one?

20 MR. RANNIK: And actually, it's  
21 not, no. I didn't have the errata page. And so  
22 we will need to, of course, make a note on the  
23 record here that this is not the final transcript  
24 because there's been a correction.

25 MS. ALLEN: Okay. And can I

1 supplement the exhibit with the errata page?

2 MR. RANNIK: Yes, please.

3 MS. ALLEN: Okay. I'll do that  
4 after the deposition. Thank you.

5 Q. Mr. Westendorf, am I right that you  
6 stand by the testimony you gave in that  
7 deposition as you sit here today?

8 A. Yes, sir.

9 Q. And if I asked you the same questions,  
10 I'd probably get the same information?

11 A. Yes, sir.

12 Q. What did you do to prepare for today's  
13 deposition?

14 A. Just consulted with Christy.

15 Q. Didn't talk to anybody else?

16 A. No, sir.

17 Q. Did you review any documents?

18 A. I looked back over my deposition.

19 Q. I want to ask you some questions about  
20 serving as a PR.

21 Based on what you know today, would you  
22 agree that someone who serves as a conservator or  
23 a PR has a responsibility to the person or the  
24 estate that they're serving for?

25 A. As of today, yes, sir.

1 Q. And you'd agree that it's wrong for  
2 someone serving as a PR to loan money to  
3 themselves from the money they're supposed to be  
4 safeguarding, correct?

5 A. I would assume so, yes.

6 Q. And it would be wrong, of course, to  
7 steal money from those accounts?

8 A. Of course.

9 Q. It's wrong to withhold money from the  
10 person you're serving for when they're entitled  
11 to that money?

12 A. That's correct.

13 Q. Is it wrong to use the money from one  
14 person you're serving as PR for to pay back money  
15 that was stolen from another person you were  
16 serving as PR for?

17 A. Yes, sir.

18 Q. Wrong to misrepresent to the court that  
19 someone who's under 18 -- sorry. Strike that.

20 Is it wrong to misrepresent to the court  
21 that someone is under the age of 18 and,  
22 therefore, needs a conservator account when you  
23 know that they're over the age of 18?

24 MS. ALLEN: Object to the form.

25 A. Could you just say that one more time,



1 please.

2 Q. Of course. Would it be wrong to tell a  
3 court that someone is under 18 years old and,  
4 therefore, they need a conservator account when  
5 you know that they're actually over the age of  
6 18?

7 MS. ALLEN: Same objection.

8 A. Yes.

9 Q. Would it be wrong to represent to the  
10 court that someone lives in Hampton County when,  
11 in fact, you know they live in Columbia?

12 MS. ALLEN: Object to the form.

13 A. Say that one more time.

14 Q. Sure. Would it be wrong to, on a  
15 conservatorship or PR application, represent to  
16 the court that the person or the estate is in  
17 Hampton, South Carolina, when, in fact, you know  
18 that they're in Columbus, South Carolina?

19 A. Yes, sir, that would be wrong.

20 MS. ALLEN: Same objection.

21 Q. Would it be wrong to do all of these  
22 things that we've just talked about even if Alex  
23 Murdaugh told you to do it?

24 A. Yes.

25 Q. Let's say that someone knew about all

1 the instances of wrongdoing. Let's say they  
2 happened and someone knew about it. And let's  
3 say that it had happened every single time Alex  
4 Murdaugh had asked someone to serve as a PR.

5 In that situation, do you think it's  
6 reasonable to expect that something -- more  
7 wrongdoing would occur if you serve as a PR for  
8 Alex Murdaugh in the future?

9 MS. ALLEN: Object to the form.

10 MR. GRESSETTE: Objection.

11 A. You could assume that, yes.

12 Q. Are you aware that Mr. Laffitte has been  
13 convicted of much of the things that we just  
14 described in federal court?

15 A. Yes, sir.

16 Q. And would you agree that Mr. Laffitte  
17 should have known that serving as a PR for  
18 Mr. Murdaugh would lead to more wrongdoing?

19 MS. ALLEN: Object to the form.

20 A. I don't know. I can't answer that.

21 Q. If Mr. Laffitte's work as a conservator  
22 or a PR for Mr. Murdaugh had involved wrongdoing  
23 every time, you would expect by 2018 that  
24 Mr. Laffitte would have understood that was the  
25 gig, right?

1 A. I would assume.

2 Q. When you were asked to serve as PR for  
3 the Estate of Gloria Satterfield, you ran that  
4 request by Mr. -- by Russell Laffitte, correct?

5 A. That is correct.

6 Q. Did he tell you anything about any of  
7 the wrongdoing associated with serving as a  
8 fiduciary for Alex Murdaugh when you asked?

9 MR. GRESSETTE: Objection.

10 A. No, sir.

11 Q. Did he tell you that Murdaugh had  
12 substantial overdrafts?

13 A. No, sir.

14 Q. Did Mr. Laffitte tell you that when he  
15 was a vice president like you were, he had caused  
16 PSB to issue illegal loans to Alex Murdaugh from  
17 a conservatorship account?

18 MS. ALLEN: Objection to the form.

19 MR. GRESSETTE: Objection.

20 A. He did not.

21 Q. Did he tell you that funds had been  
22 disbursed in prior conservatorships in violation  
23 of the disbursement statements approved by the  
24 court?

25 A. He did not.

1 Q. He should have informed you of these  
2 things, though, right?

3 MR. GRESSETTE: Objection.

4 A. I would hope so.

5 Q. You would have liked to know?

6 A. Yes, sir.

7 Q. If you had known these things in 2018,  
8 would you have agreed to serve as a PR for the  
9 Estate of Gloria Satterfield?

10 A. No, sir.

11 Q. Would you have signed the application  
12 for the appointment to be made a PR when Murdaugh  
13 brought it to your office?

14 A. If I knew those things, no, sir, I  
15 wouldn't have.

16 Q. Let me show you that or a document and  
17 ask if you recognize it.

18 (Exhibit No. 02 marked for  
19 identification.)

20 Q. Do you recognize this document?

21 A. Yes, sir.

22 Q. And what is this document?

23 A. Application for successor personal  
24 representative.

25 Q. Now, can you please read for us --

1       there's an X through one of the boxes on the  
2       first page at the bottom there. It says:  
3       "Priority for appointment of the successor  
4       personal representative is, other, describe."

5               Do you see where I'm talking about?

6       A. Yes, sir.

7       Q. What does that say?

8       A. "Current personal representative desires  
9       bank vice president to serve as personal  
10       representative. Sole other heir concurs."

11       Q. Okay. And then if I can get you to turn  
12       to the next page. At the top right, there's a  
13       verification.

14               Is that your signature?

15       A. That is.

16       Q. What is the address that's provided  
17       there?

18       A. 601 First Street West -- First Street --  
19       excuse me -- Hampton, South Carolina 29924.

20       Q. And what's at that bank?

21       A. The bank, Palmetto State Bank.

22       Q. The telephone number, what telephone  
23       number is that?

24       A. (803) 943-2671.

25       Q. And is that a bank phone number?

1 A. Yes, sir. That's the correction I made  
2 on the deposition, if I may say that.

3 Q. You may.

4 A. I did not type that and that's what I  
5 told -- that it was already there.

6 Q. As part of serving as PR for the Estate  
7 of Gloria Satterfield, you endorsed a check from  
8 Nautilus, correct?

9 A. Yes, sir.

10 Q. I think you were at your office when you  
11 did that?

12 A. That's correct.

13 Q. Did you receive a letter with that  
14 check?

15 A. Yes, sir.

16 Q. And did that letter say these funds are  
17 to be held in trust until an order approving the  
18 settlement has been filed?

19 A. Yes, sir.

20 Q. If you had known of Alex Murdaugh's  
21 wrongdoing in the past, would you have  
22 endorsed -- well, let me ask you this. I'm  
23 sorry. Did you do anything to ensure that an  
24 order approving the settlement was filed before  
25 the funds were distributed?

1 A. No, sir.

2 Q. Because you trusted Cory Fleming, right?

3 A. That's correct.

4 Q. If you had known about Alex Murdaugh's  
5 prior wrongdoing and you were in this position,  
6 you probably would have checked more things,  
7 right?

8 A. Correct.

9 Q. So let me ask you a little bit about  
10 your employment or your work now with PSB.

11 So Mr. Malinowski told us about it and  
12 that you're now an independent contractor. And  
13 it sounded to me like you do sort of general  
14 consulting work for the bank.

15 A. Yes, sir.

16 Q. Why the change from your prior role?

17 A. I was unable to be bonded under the  
18 bank's bond.

19 Q. I see. Okay. Okay.

20 And that was as a result of the mess  
21 with the Estate of Gloria Satterfield?

22 A. I assume so, yes, sir.

23 Q. And the bond that you were under, this  
24 is the fidelity bond for the bank?

25 A. I would assume so. I don't know.

1 Q. Now, you heard us also talk a little bit  
2 earlier about the PR fee that you were paid?

3 A. Yes, sir.

4 Q. And that was \$30,000?

5 A. That's correct.

6 Q. And you refunded that to the  
7 Satterfields or you paid that to the Bland  
8 Richter firm?

9 A. Yes, sir, immediately.

10 Q. And that was -- did that come out of  
11 your Palmetto State Bank account?

12 A. I borrowed the money.

13 Q. Okay.

14 A. I have a loan right now I'm paying back  
15 for it.

16 Q. Okay. With Palmetto State Bank?

17 A. Yes, sir.

18 Q. When you were first contacted about  
19 serving as the PR for the Estate of Gloria  
20 Satterfield, I think you said it was right before  
21 Thanksgiving and you were out of the office; is  
22 that right?

23 A. Yes, sir.

24 Q. So it was a call you got on your cell  
25 phone?



1 A. That is correct.

2 Q. Is that a personal cell phone or one  
3 that's provided to you by the bank?

4 A. Personal.

5 Q. Does the bank ever reimburse you for  
6 cell phone expenses?

7 A. No, sir.

8 Q. It was a number that you had previously  
9 before you worked at the bank?

10 A. No, sir.

11 Q. But it had nothing to do -- it was just  
12 your private phone?

13 A. It's my private phone, yes, sir.

14 Q. Okay. Were you reimbursed for any  
15 expenses incurred acting as the PR for the Estate  
16 of Gloria Satterfield?

17 A. From who?

18 Q. From the bank.

19 A. They've been paying my legal fees.

20 Q. When you were the PR for the estate, did  
21 the probate court require any kind of bond to be  
22 posted?

23 A. Not that I'm aware.

24 Q. Did you know that Gloria Satterfield had  
25 a bank account, or bank accounts, at PSB when she

1 died?

2 A. I didn't.

3 Q. You did?

4 A. I did not.

5 Q. Did not. Okay.

6 A. Excuse me.

7 Q. Because those were not included as part  
8 of the estate, right?

9 A. I guess, yes.

10 Q. And the funds didn't show up on the  
11 final accounting for the estate?

12 A. That's right.

13 Q. I'd like to show you just a couple of  
14 documents.

15 (Exhibit No. 03 marked for  
16 identification.)

17 Q. This is a document, I'll represent to  
18 you, that was produced in this litigation. Can  
19 you tell from looking at it what this is?

20 A. Looks like a checking account for  
21 Ms. Gloria Satterfield.

22 Q. And it shows that the balance is getting  
23 zeroed out in January of 2019?

24 A. That's right.

25 Q. In January of 2019 you were already

1 serving as the PR for the estate; is that  
2 correct?

3 A. That is correct.

4 Q. If you look at the second page, which  
5 you are, at the signature line there, what does  
6 that say?

7 A. It looks like it says Michael  
8 Satterfield, personal rep.

9 Q. Okay. But at this time, he was not the  
10 personal rep; is that correct?

11 A. Not by my documents, no.

12 Q. Okay. I'd like to show you another  
13 document produced in this case.

14 (Exhibit No. 04 marked for  
15 identification.)

16 Q. And ask you if you can tell what this  
17 is. I know it's not a lot to go on.

18 A. It looks like it's where I transferred  
19 money from one account of Alec's to another per  
20 Russell's request.

21 Q. And I was going to ask what your  
22 involvement was. So you would have been the one  
23 who effected the transfer?

24 A. Yes, sir.

25 Q. Did that happen often?

1           A. If Russell wasn't at the office, I would  
2           get a call from him and say, would you move that  
3           from an account, line of credit, whatever, to a  
4           checking account.

5           Q. Okay. Got it.

6                     Do you happen to -- I don't know why you  
7           would, but do you happen to recognize what those  
8           two account numbers are on the left-hand side  
9           there?

10          A. Not really.

11          Q. Yeah, no worries.

12                     (Exhibit No. 05 marked for  
13           identification.)

14                     MS. ALLEN: Can I take a second to  
15           look at this one? Because I haven't seen it.

16                     MR. RANNIK: Of course, you can.  
17           And, Christy, let me give you one more that's  
18           coming.

19                     MS. ALLEN: Okay. Let's step out  
20           for a second.

21                     (Brief recess.)

22          Q. So we're looking at Exhibit 5. What is  
23           this document?

24          A. This is an exception sheet. This is  
25           done on loans when -- by the loan officer when

1       they're done. And if there was any exceptions to  
2       the loan -- which on this one, you can see it's  
3       got a Y by credit score. So obviously, that  
4       tells me the credit score was under 600. So  
5       there was an exception there.

6               Q. And sorry. So we're clear, you're  
7       talking about the beacon score being less than  
8       600?

9               A. Correct.

10              Q. Beacon score is a credit score?

11              A. Yes, sir.

12                      And then on line -- Code 30 would have  
13       been loan terms outside guidelines. And that was  
14       checked yes. So obviously, the term of that  
15       loan, submitted by Russell as the loan officer,  
16       and it just comes to another loan officer to sign  
17       as a dual.

18              Q. Got it. Got it.

19                      Was there any discussion with  
20       Mr. Laffitte about this loan --

21              A. No, sir.

22              Q. -- at this time?

23                      Okay. There's also -- if I can get you  
24       to look at Code No. 22 on there.

25              A. Yes, sir.

1 Q. It says: "Debt service coverage ratio  
2 less than 1.2 percent."

3 What does that mean?

4 A. Debt service coverage ratio is what we  
5 use like our commercial loans to -- debt to  
6 income, basically. And obviously, it was less  
7 than that.

8 Q. Got it.

9 MR. RANNIK: All right. If we  
10 could mark this as Exhibit 6, please.

11 (Exhibit No. 06 marked for  
12 identification.)

13 Q. Mr. Westendorf, same question, what's  
14 this document?

15 A. Environmental checklist is something  
16 that's done on our renewals of our real estate  
17 loans and basically says that it's an improved  
18 property. And if there is any environmental  
19 problems, you would check yes down there. It's  
20 not my writing, though, so...

21 Q. Gotcha.

22 So you're listed as the inspecting  
23 officer --

24 (Reporter clarification.)

25 Q. So you're listed as the inspecting

1 officer, but you didn't fill out this form?

2 A. I did not.

3 Q. Okay.

4 A. But all the information looks right.

5 Q. Okay. Mr. Westendorf, another thing  
6 that you heard Mr. Malinowski testify to is that  
7 if you incur any business expenses that you want  
8 reimbursed by the bank, you should submit an  
9 expense form.

10 Have you ever done that?

11 A. Yes.

12 Q. Often?

13 A. Usually about once a year, I was  
14 fortunate to go to a bankers convention. I was  
15 involved with the bankers association before all  
16 this. And the bank was nice enough to let me go  
17 and they would reimburse me for my fees.

18 Q. Anything else you remember being on  
19 any --

20 A. Maybe some gas, but other than that, I  
21 can't remember any.

22 MR. RANNIK: Okay. All right.  
23 Will you give me a moment to confer with counsel.

24 (Brief recess.)

25 Q. Just a few more questions.

1 A. Sure.

2 Q. Did you ever submit a conflict of  
3 interest report to the bank?

4 A. I did not.

5 Q. Okay. I'm going to show you what we  
6 marked in the previous exhibit as Bank Exhibit 3.

7 Have you ever seen this document?

8 A. No, sir.

9 Q. Okay. And if you flip to the last page,  
10 did you ever fill this out and submit it to the  
11 bank?

12 A. No, sir.

13 Q. Thank you.

14 When you were approached about being PR,  
15 I asked you if you had run that by Russell  
16 Laffitte.

17 Is there anybody else at the bank you  
18 ran that past?

19 A. When I went and spoke to Russell, I  
20 asked him if I could serve as a PR in a case that  
21 Alec was involved in. I didn't know what the  
22 case was at that time. I asked him if he could  
23 do it. He said, Let me talk to my dad. So both  
24 him and Mr. Laffitte said I could do it.

25 Q. Okay. Did you ask anybody else? Did



1           you ask the bank president? I think it was  
2           Mr. Malinowski at that time.

3           A. I did not.

4           Q. All right. I'd like to quickly show  
5           you --

6                       MR. RANNIK: And, Christy, these  
7           are some of the -- these are the settlement  
8           document exhibits from the prior deposition.  
9           These are copies, and I just want to go through  
10          and authenticate them.

11                      MS. ALLEN: Okay. Just give me a  
12          second.

13                      MR. RANNIK: Of course.

14                      MS. ALLEN: Okay. Thank you.

15                      MR. RANNIK: I'd like to mark this  
16          collection of documents as Exhibit 7, please.

17                      (Exhibit No. 07 marked for  
18          identification.)

19           Q. Mr. Malinowski --

20           A. Westendorf.

21           Q. Mr. Westendorf. Sorry. Old habits.

22           A. Yes.

23           Q. So I've handed you Exhibit 7, which I  
24          believe are the various documents relating to the  
25          settlement of the case involving the Estate of

1 Gloria Satterfield.

2 Do you recognize these documents?

3 A. All but 19. I didn't see 19 until I was  
4 at my deposition with Eric Bland.

5 Q. Okay. So let's go one at a time. The  
6 one -- the first page of this exhibit, which is  
7 marked with a 30 on it, you recognize that, and  
8 that's your signature?

9 A. No. I recognize this from being shown  
10 over time. That was after -- let's say after  
11 Labor Day '21, I saw this. I never saw that  
12 before that.

13 Q. Got it. Got it.

14 A. And that's Cory Fleming's signature.

15 Q. It is. I saw a C. Sorry. Jumping  
16 ahead of myself.

17 All right. The next document is marked  
18 Exhibit 24 to your previous deposition. Do you  
19 recognize this?

20 A. Yes, sir.

21 Q. And is this an accurate copy of the  
22 order approving settlement and the settlement  
23 statement that you signed?

24 A. Yes, sir. I signed this in Judge  
25 Mullen's chamber on the 13th of May, 2019.

1 Q. Okay.

2 A. And she -- that's her on the -- on that  
3 one.

4 Q. Right. You mean at the bottom of each  
5 page?

6 A. Yes, and the final signature under  
7 presiding judge.

8 Q. Okay. The next one, which was  
9 Exhibit 23 to your previous deposition, do you  
10 recognize this document?

11 A. Yes, sir.

12 Q. And is this a correct -- true and  
13 correct copy of the petition for the approval of  
14 that settlement?

15 A. It looks to be, yes, sir.

16 Q. And that's your signature on the pages 5  
17 and 6?

18 A. Yes, sir.

19 Q. And the next is Exhibit 21 to your  
20 previous deposition and this is a release of  
21 claims against various parties.

22 Do you recognize this document?

23 A. Yes, sir.

24 Q. And is that your signature on the last  
25 page?

1 A. Yes, sir.

2 Q. And then I believe you told me 19 is one  
3 that you had not seen until your first  
4 deposition?

5 A. Yes, sir.

6 Q. Okay. And there's no signature by you  
7 anywhere on this document, right?

8 A. No.

9 Q. All right. I asked you a bunch of  
10 questions about what Mr. Laffitte did or did not  
11 tell you when you asked if you could serve as PR  
12 for the Estate of Gloria Satterfield. I forgot  
13 one.

14 Did he tell you that he had been asked  
15 to serve as the PR for the estate?

16 A. He did not.

17 Q. Did he tell you -- I assume he didn't,  
18 therefore, tell you why he was not serving as the  
19 PR?

20 A. He did not.

21 Q. Okay. Another bit of cleanup, if we  
22 could go back to -- which exhibit was this?

23 A. No. 3.

24 Q. Right there, No. 3. Just to clarify,  
25 this withdrawal, you didn't approve this

1 withdrawal as personal representative for the  
2 Estate of Gloria Satterfield, correct?

3 A. No, sir.

4 Q. And the first time you knew anything  
5 about this was probably at today's deposition?

6 A. That is correct.

7 Q. Did you ever have to submit a business  
8 development proposal to the bank?

9 A. What do you mean by that?

10 Q. I mean sort of a plan of these -- I'm  
11 going to try and bring in X amount of business or  
12 these are the kinds of customers I'm going to try  
13 and target or anything like that?

14 A. No. We used to have what was called a  
15 call -- not a call report, but a call list. And  
16 we'd try to go out couple times a month and just  
17 visit people. And I'd turn that in to  
18 Mr. Laffitte, but that's been 15, 20 years ago,  
19 so...

20 Q. Okay.

21 A. That would be the only business  
22 development I would have done.

23 MR. RANNIK: All right. Thank you  
24 very much, Mr. Westendorf. That's all I've got  
25 for you.

1 MR. PENDARVIS: No questions on  
2 behalf of Mr. Fleming.

3 MR. HOOD: This is Bobby Hood. I  
4 have no questions.

5 MR. GRESSETTE: None for the bank.

6 (Deposition concluded at 2:36 p.m.)

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CERTIFICATE OF REPORTER

I, Ruth Mott, Registered Professional Reporter, Certified Realtime Reporter, and Notary Public for the State of South Carolina, do hereby certify that the witness in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and location therein stated; that the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed by computer-aided transcription, that the foregoing is a full, complete and true record of the testimony of the witness and of all objections made at the time of the examination; and that the witness was given an opportunity to read and correct said deposition and to subscribe the same.

Should the signature of the witness not be affixed to the deposition, the witness shall not have availed himself of the opportunity to sign or the signature has been waived.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal on July 12, 2023 at Moncks Corner, Berkeley County, South Carolina.

Ruth Mott,  
Registered Professional Reporter  
Certified Realtime Reporter  
and Notary Public  
My Commission expires  
February 23, 2025

1 DEPONENT CORRECTION SHEET

2 I, the undersigned, CHAD WESTENDORF, do  
3 hereby certify that I have read the foregoing  
4 deposition and wish to make the following  
5 clarifications and/or corrections, if any.

6 PAGE LINE CHANGE REASON

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22 CHAD WESTENDORF Date

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<p> <b>clement@wglfirm.co</b>  <b>m</b> (1)  <b>CLINTON</b> (1)  <b>Code</b> (2)  <b>collection</b> (1)  <b>Columbia</b> (1)  <b>Columbus</b> (1)  <b>come</b> (1)  <b>comes</b> (1)  <b>coming</b> (1)  <b>commercial</b> (1)  <b>Commission</b> (1)  <b>COMPANY</b> (2)  <b>complete</b> (1)  <b>computer-aided</b> (1)  <b>concluded</b> (1)  <b>concurs</b> (1)  <b>confer</b> (1)  <b>conflict</b> (1)  <b>conservator</b> (4)  <b>conservatorship</b> (2)  <b>conservatorships</b> (1)  <b>consulted</b> (1)  <b>consulting</b> (1)  <b>contacted</b> (1)  <b>contractor</b> (1)  <b>convention</b> (1)  <b>convicted</b> (1)  <b>copies</b> (1)  <b>copy</b> (3)  <b>Corner</b> (1)  <b>correct</b> (23)  <b>CORRECTION</b> (6)  <b>corrections</b> (1)  <b>CORY</b> (4)  <b>counsel</b> (2)  <b>County</b> (2)  <b>couple</b> (2)  <b>course</b> (7)  <b>COURT</b> (10)  <b>coverage</b> (2)  <b>credit</b> (4)  <b>CRR</b> (1)  <b>ctm@epting-</b>  <b>law.com</b> (1)  <b>Current</b> (1)  <b>customers</b> (1)    <b>&lt; D &gt;</b> </p>	<p> <b>dad</b> (1)  <b>DATE</b> (2)  <b>Day</b> (1)  <b>Debt</b> (3)  <b>Defendants</b> (1)  <b>DEPONENT</b> (3)  <b>deposed</b> (1)  <b>DEPOSITION</b> (23)  <b>describe</b> (1)  <b>described</b> (1)  <b>DESCRIPTION</b> (1)  <b>desires</b> (1)  <b>development</b> (2)  <b>died</b> (1)  <b>direct</b> (1)  <b>disbursed</b> (1)  <b>disbursement</b> (1)  <b>discussion</b> (1)  <b>distributed</b> (1)  <b>DISTRICT</b> (2)  <b>DIVISION</b> (1)  <b>document</b> (14)  <b>DOCUMENTS</b> (7)  <b>doing</b> (1)  <b>doubts</b> (1)  <b>dual</b> (1)  <b>duly</b> (2)    <b>&lt; E &gt;</b>  <b>earlier</b> (1)  <b>easier</b> (1)  <b>effected</b> (1)  <b>employment</b> (1)  <b>endorsed</b> (2)  <b>ensure</b> (1)  <b>entitled</b> (1)    <b>ENVIRONMENTAL</b>  <b>(3)</b>  <b>EPTING</b> (1)  <b>Eric</b> (1)  <b>errata</b> (2)  <b>errors</b> (2)  <b>Estate</b> (18)  <b>events</b> (1)  <b>EXAMINATION</b>  <b>(3)</b>  <b>EXCEPTION</b> (3)  <b>exceptions</b> (1) </p>	<p> <b>excuse</b> (2)  <b>EXHIBIT</b> (28)  <b>EXHIBITS</b> (4)  <b>expect</b> (2)  <b>expense</b> (1)  <b>expenses</b> (3)  <b>expires</b> (1)    <b>&lt; F &gt;</b>  <b>fact</b> (2)  <b>fair</b> (1)  <b>February</b> (1)  <b>federal</b> (1)  <b>fee</b> (1)  <b>fees</b> (2)  <b>fidelity</b> (1)  <b>fiduciary</b> (1)  <b>filed</b> (2)  <b>fill</b> (2)  <b>final</b> (3)  <b>FIRM</b> (2)  <b>first</b> (8)  <b>FLEMING</b> (4)  <b>Fleming's</b> (1)  <b>flip</b> (1)  <b>following</b> (1)  <b>follows</b> (1)  <b>FORD</b> (1)  <b>foregoing</b> (3)  <b>forgot</b> (1)  <b>form</b> (7)  <b>fortunate</b> (1)  <b>FREEMAN</b> (2)  <b>full</b> (1)  <b>funds</b> (4)  <b>further</b> (1)  <b>future</b> (1)    <b>&lt; G &gt;</b>  <b>gas</b> (1)  <b>general</b> (1)  <b>getting</b> (1)  <b>gig</b> (1)  <b>give</b> (3)  <b>given</b> (2)  <b>giving</b> (1)  <b>Gloria</b> (12)  <b>go</b> (8)  <b>going</b> (7) </p>	<p> <b>Good</b> (1)  <b>Gotcha</b> (1)  <b>great</b> (1)  <b>GRESSETTE</b> (8)  <b>gressette@wglfirm.co</b>  <b>m</b> (1)  <b>guess</b> (1)  <b>guidelines</b> (1)    <b>&lt; H &gt;</b>  <b>habits</b> (1)  <b>Hampton</b> (3)  <b>hand</b> (1)  <b>handed</b> (1)  <b>happen</b> (3)  <b>happened</b> (2)  <b>Hasell</b> (1)  <b>head</b> (2)  <b>hear</b> (1)  <b>heard</b> (3)  <b>heir</b> (1)  <b>held</b> (1)  <b>hereunto</b> (1)  <b>HOOD</b> (4)  <b>hope</b> (1)  <b>hopefully</b> (1)    <b>&lt; I &gt;</b>  <b>identification</b> (7)  <b>illegal</b> (1)  <b>immediately</b> (1)  <b>improved</b> (1)  <b>included</b> (1)  <b>income</b> (1)  <b>incur</b> (1)  <b>incurred</b> (1)  <b>independent</b> (1)  <b>information</b> (2)  <b>informed</b> (1)  <b>inspecting</b> (2)  <b>instances</b> (1)  <b>instructed</b> (1)  <b>INSURANCE</b> (2)  <b>interest</b> (1)  <b>interested</b> (1)  <b>involved</b> (3)  <b>involvement</b> (1)  <b>involving</b> (1)  <b>issue</b> (1) </p>
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JAMES (1)

January (2)

jgr@epting-law.com  
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job (1)

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(14)	<b>Street</b> (7)	<b>trust</b> (1)	<b>EN.COM</b> (1)
<b>Satterfields</b> (1)	<b>Strike</b> (1)	<b>trusted</b> (1)	<b>&lt; Y &gt;</b>
<b>save</b> (1)	<b>submit</b> (4)	<b>truth</b> (4)	<b>Yeah</b> (1)
<b>saw</b> (3)	<b>submitted</b> (1)	<b>try</b> (3)	<b>year</b> (1)
<b>says</b> (4)	<b>subscribe</b> (1)	<b>turn</b> (2)	<b>years</b> (2)
<b>SC</b> (7)	<b>substantial</b> (1)	<b>two</b> (1)	<b>yeses</b> (1)
<b>score</b> (5)	<b>SUCCESSOR</b> (3)	<b>type</b> (1)	<b>&lt; U &gt;</b>
<b>seal</b> (1)	<b>Suite</b> (1)	<b>unable</b> (1)	<b>&lt; Z &gt;</b>
<b>second</b> (4)	<b>supplement</b> (1)	<b>undersigned</b> (1)	<b>zeroed</b> (1)
<b>see</b> (4)	<b>supposed</b> (1)	<b>understand</b> (2)	<b>ZOOM</b> (2)
<b>seen</b> (3)	<b>sure</b> (3)	<b>understood</b> (2)	
<b>serve</b> (8)	<b>sworn</b> (2)	<b>UNITED</b> (1)	
<b>serves</b> (1)	<b>&lt; T &gt;</b>	<b>use</b> (2)	
<b>service</b> (3)	<b>take</b> (2)	<b>Usually</b> (1)	
<b>serving</b> (12)	<b>taken</b> (1)	<b>&lt; V &gt;</b>	
<b>SETTLEMENT</b> (8)	<b>talk</b> (3)	<b>various</b> (2)	
<b>shakes</b> (1)	<b>talked</b> (1)	<b>verbal</b> (1)	
<b>SHEET</b> (4)	<b>talking</b> (2)	<b>verification</b> (1)	
<b>show</b> (6)	<b>target</b> (1)	<b>vice</b> (2)	
<b>shown</b> (1)	<b>telephone</b> (2)	<b>violation</b> (1)	
<b>shows</b> (1)	<b>tell</b> (12)	<b>visit</b> (1)	
<b>side</b> (1)	<b>tells</b> (1)	<b>vs</b> (1)	
<b>sign</b> (2)	<b>term</b> (1)		
	<b>terms</b> (1)		